

**PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY  
AND THE  
EVANSVILLE ENVIRONMENTAL PROTECTION  
AGENCY**

**Red Spot Paint and Varnish Co., Inc  
1016 East Columbia St.  
Evansville, Indiana 47711**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-7524-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 31, 2001  Expiration Date: May 31, 2006

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]  
[326 IAC 2-7-6(6)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]
- B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]
- B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]
- B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less  
Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

#### Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-6]

**Compliance Requirements [326 IAC 2-1.1-11]**

C.9 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS -Tank Farms & Blending and Mixing Operations**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 NESHAPs [326 IAC 14][40 CFR Part 63]

D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]

**Compliance Determination Requirements**

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.4 Record Keeping Requirements

**D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**Certification**

**Emergency Occurrence Report**

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Evansville Environmental Protection Agency. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

---

The Permittee owns and operates stationary source relating to the operation of mixing and blending of paint, varnishes, thinners and lacquers.

Responsible Official:	Pete Ruthenberg
Source Address:	1016 E. Columbia St., Evansville, IN 47711
Mailing Address:	1016 E Columbia St., Evansville, IN 47711
SIC Code:	2851
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4,000 gallons;
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons;
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons;
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons;
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons;
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons;
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons;
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons;

- (c) one (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF4-1, TF4-2 and TF4-3, TF4-1 and TF4-2 with a maximum capacity of 2,100 gallons, and TF3-3 with a maximum capacity of 2,100 gallons;
  - (2) four (4) fixed roof dome tanks, identified as TF4-4, TF4-5, TF4-6 and TF4-7, each with a maximum capacity of 2,300 gallons;
- (d) one (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) one (1) fixed roof dome tank, identified as TF3-1, with a maximum capacity of 3,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF3-2 and TF3-3, each with a maximum capacity of 2,500 gallons;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of 21,885,000 lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
  - (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of 57,120,000 lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
  - (1) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (2) five (5) general exhaust ducts;
  - (3) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of 22,995,000 lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
  - (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;
- (h) portable mix tanks and totes consisting of:
  - (1) one hundred and forty six (146) portable mix tanks with capacities ranging from 6 to 55 gallons;
  - (2) forty eight (48) portable mix tanks with capacities ranging from 56 to 99 gallons;
  - (3) seventy one (71) portable mix tanks with capacities ranging from 100 to 199 gallons;
  - (4) thirty seven (37) portable mix tanks with capacities ranging from 200 to 299 gallons;
  - (5) thirty four (34) portable mix tanks with capacities ranging from 300 to 399 gallons;
  - (6) nine (9) portable mix tanks with capacities ranging from 400 to 499 gallons;
  - (7) eight (8) portable mix tanks with capacities ranging from 500 to 605 gallons;
  - (8) forty (40) portable mix totes, each with a maximum capacity of 99 gallons;

- (9) twenty (20) portable mix totes with capacities ranging from 100 to 299 gallons;
- (10) fifty (50) portable mix totes with capacities ranging from 300 to 500 gallons;
- (11) twenty (20) portable mix totes with capacities ranging from 501 to 605 gallons;
- (i) one (1) waste processing facility, identified as building # 8, installed in 1967, with a maximum throughput rate of 2,149,719 lbs per year, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1; and
- (j) one (1) mixing operation, identified as nextel manufacturing building # 14, installed in 1967, with a maximum production rate of 5200 gallons per year, exhausting to stack SV14-8, and consisting of:
  - (1) three (3) mixing stations, identified as 68, 69 and 70, each with a maximum capacity of 700 gallons;
  - (2) three (3) general exhaust ducts.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968;
  - (2) two (2) Cleaver Brooks natural gas fired boilers located in building # 6, identified as western primary boiler, installed in 1965, and western standby boiler, installed in 1998, each rated at 4.0 mmBtu per hour;
  - (3) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour;
  - (4) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour;
  - (5) one (1) natural gas fired boiler located in building # 14, identified as Bryan Steam Corp. boiler, installed in 1982, and rated at 0.25 mmBtu per hour;
  - (6) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour;
- (b) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
  - (1) Dry material handling with PM emissions less than 5 tons/year;
- (c) Paved and unpaved roads and parking lots with public access;
- (d) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
  - (1) one (1) natural gas fired emergency generator, identified as Onan-Cummins-Genset at 134 horsepower;
- (e) Stationary fire pumps,
  - (1) one (1) emergency diesel powered fire pump, identified as Cummins Engine co., model # 6 BTA 5.9 F1;

- (f) five (5) laboratory operations as defined in 326 IAC 2-7-1 (20)(C),
  - (1) one (1) laboratory, identified as QAQC lab building # 3, and consisting of:
    - (a) two (2) Devilbiss wash water spray booths, identified as # 1 and 2;
    - (b) four (4) binks dry filter back spray booths, identified as # 3 and 6;
    - (c) three (3) milling units, identified as # 34 and 36;
    - (d) one (1) lab hood;
    - (e) six (6) lab ovens;
    - (f) eight (8) general exhaust ducts;
  - (2) one (1) laboratory, identified as building # 3 south, and consisting of:
    - (a) one (1) devilbiss wash water spray booth, identified as # 7;
    - (b) four (4) lab hoods;
    - (c) two (2) lab ovens;
    - (d) twenty eight (28) general exhaust ducts;
  - (3) one (1) laboratory, identified as UV/VM research, building # 5, and consisting of:
    - (a) one (1) devilbiss wash water spray booth, identified as # 74;
    - (b) two (2) dry filter back spray booths, identified as # 76 and 88;
    - (c) one (1) flow coater unit, identified as # 75;
    - (d) four (4) lab ovens;
    - (e) fifteen (15) test equipment drops;
    - (f) three (3) general exhaust ducts;
  - (4) one (1) laboratory, identified as R & D facility, building # 7, and consisting of:
    - (a) two (2) devilbiss wash water spray booths, identified as # 14 and 17;
    - (b) eight (8) binks dry filter back spray booths, identified as # 8 and 16;
    - (c) four (4) pilot scale milling units;
    - (d) one (1) tint dispenser, identified as # 101;
    - (e) seventeen (17) lab hoods;
    - (f) twenty seven (27) lab ovens;
    - (g) ten (10) test equipment drops;
    - (h) thirteen (13) general exhaust ducts;
  - (5) one (1) laboratory, identified as nextel manufacturing building # 14, and consisting of:
    - (a) one (1) dry filter back spray booth, identified as # 71;
    - (b) one (1) nextel dryer unit;
    - (c) one (1) filter belt;
    - (d) one (1) centrifuge;
    - (e) one (1) hot room;
    - (f) three (3) lab hoods;
    - (g) three (3) general exhaust ducts.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.3 Enforceability [326 IAC 2-7-7]**

- (1) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the Evansville Environmental Protection Agency, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Evansville Environmental Protection Agency.

### **B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.5 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



- (b) The Permittee shall furnish to IDEM, OAQ, and the Evansville Environmental Protection Agency within a reasonable time, any information that IDEM, OAQ, and the Evansville Environmental Protection Agency may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the Evansville Environmental Protection Agency copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Evansville Environmental Protection Agency on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and the Evansville Environmental Protection Agency may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the Evansville Environmental Protection Agency upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the Evansville Environmental Protection Agency. IDEM, OAQ, and the Evansville Environmental Protection Agency may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and the Evansville Environmental Protection Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and the Evansville Environmental Protection Agency within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Evansville Environmental Protection Agency within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Evansville EPA Telephone Number: 812-435-6145

Evansville EPA Facsimile Number: 812-435-6155

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAQ, and the Evansville Environmental Protection Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and the Evansville Environmental Protection Agency by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or the Evansville Environmental Protection Agency shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or the Evansville Environmental Protection Agency has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or the Evansville Environmental Protection Agency has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

---

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or the Evansville Environmental Protection Agency determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or the Evansville Environmental Protection Agency to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or the Evansville Environmental Protection Agency at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or the Evansville Environmental Protection Agency may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and the Evansville Environmental Protection Agency and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Evansville Environmental Protection Agency on or before the date it is due.

- (2) If IDEM, OAQ, and the Evansville Environmental Protection Agency, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.



- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and the Evansville Environmental Protection Agency, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and the Evansville Environmental Protection Agency, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, and the Evansville Environmental Protection Agency fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

---

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and the Evansville Environmental Protection Agency in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

---

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

---

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and the Evansville Environmental Protection Agency U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and the Evansville Environmental Protection Agency, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or the Evansville Environmental Protection Agency the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the Evansville Environmental Protection Agency not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the Evansville Environmental Protection Agency, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, and the Evansville Environmental Protection Agency, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, and the Evansville Environmental Protection Agency, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);



All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

---

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Evansville Environmental Protection Agency on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Evansville Environmental Protection Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the Evansville Environmental Protection Agency within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the Evansville Environmental Protection Agency on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4,000 gallons;
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons;
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons;
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons;
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons;
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons;
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons;
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons;
- (c) one (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF4-1, TF4-2 and TF4-3, TF4-1 and TF4-2 with a maximum capacity of 2,100 gallons, and TF3-3 with a maximum capacity of 2,100 gallons;
  - (2) four (4) fixed roof dome tanks, identified as TF4-4, TF4-5, TF4-6 and TF4-7, each with a maximum capacity of 2,300 gallons;

- (d) one (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) one (1) fixed roof dome tank, identified as TF3-1, with a maximum capacity of 3,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF3-2 and TF3-3, each with a maximum capacity of 2,500 gallons;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of 21,885,000 lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
  - (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of 57,120,000 lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
  - (1) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (2) five (5) general exhaust ducts;
  - (3) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of 22,995,000 lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
  - (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;

- (h) portable mix tanks and totes consisting of:
- (1) one hundred and forty six (146) portable mix tanks with capacities ranging from 6 to 55 gallons;
  - (2) forty eight (48) portable mix tanks with capacities ranging from 56 to 99 gallons;
  - (3) seventy one (71) portable mix tanks with capacities ranging from 100 to 199 gallons;
  - (4) thirty seven (37) portable mix tanks with capacities ranging from 200 to 299 gallons;
  - (5) thirty four (34) portable mix tanks with capacities ranging from 300 to 399 gallons;
  - (6) nine (9) portable mix tanks with capacities ranging from 400 to 499 gallons;
  - (7) eight (8) portable mix tanks with capacities ranging from 500 to 605 gallons;
  - (8) forty (40) portable mix totes, each with a maximum capacity of 99 gallons;
  - (9) twenty (20) portable mix totes with capacities ranging from 100 to 299 gallons;
  - (10) fifty (50) portable mix totes with capacities ranging from 300 to 500 gallons;
  - (11) twenty (20) portable mix totes with capacities ranging from 501 to 605 gallons;
- (i) one (1) waste processing facility, identified as building # 8, installed in 1967, with a maximum throughput rate of 2,149,719 lbs per year, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1; and
- (j) one (1) mixing operation, identified as nextel manufacturing building # 14, with a maximum production rate of 5200 gallons per year, exhausting to stack SV14-8, and consisting of:
- (1) three (3) mixing stations, identified as 68, 69 and 70, each with a maximum capacity of 700 gallons;
  - (2) three (3) general exhaust ducts.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

##### **D.1.1 NESHAPs [326 IAC 14][40 CFR Part 63]**

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. However, the US EPA has established (Manufacture of Paints, Coatings, and Adhesives) as a source category requiring HAP control and established November 15, 2000 as the final rule promulgation date. The source shall evaluate applicability to the rule upon its promulgation and shall comply with the applicable rules.

##### **D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]**

Any change or modification to the tank farms # 3 and # 4 that may increase the PTE of VOC from these tank farms to more than 25 tons per year, or any change in the vapor pressures (at 20°C) of each organic liquid stored that may exceed the following shall obtain approval from OAQ and the Evansville Environmental Protection Agency before such changes can be made.

- (1) 14.78 psi for tank TF4-1 and TF4-2;
- (2) 4.49 psi for tank TF4-3;
- (3) 15.0 psi for tank TF4-4, TF4-5, TF4-6 and TF4-7;
- (4) 36.9 psi for tank TF3-1;
- (5) 5.60 psi for tank TF3-2;
- (6) 8.50 psi for tank TF3-3.

#### **Compliance Determination Requirements**

**D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

---

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform VOC emission testing at the facility utilizing methods as approved by the Commissioner to verify the emission factors submitted by the source. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance. Testing shall be conducted in accordance with Section C- Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

Currently there are no Compliance Monitoring Requirements applicable to these emission units.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.4 Record Keeping Requirements**

---

To document compliance with Conditions D.1.2, the owner or operator of the facility shall collect and record each month and maintain all of the following information:

- (1) The name and identification number of each organic liquid stored in Tank farms # 3 and #4.
- (2) The vapor pressure of each organic liquid stored in Tank farms # 3 and # 4.
- (3) The date of storage for each type organic liquid stored in Tank farms #3 and #4.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968;
  - (1) two (2) Cleaver Brooks natural gas fired boilers located in building # 6, identified as western primary boiler, installed in 1965, and western standby boiler, installed in 1998, each rated at 4.0 mmBtu per hour;
  - (2) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour;
  - (3) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour;
  - (4) one (1) natural gas fired boiler located in building # 14, identified as Bryan Steam Corp. boiler, installed in 1982, and rated at 0.25 mmBtu per hour;
  - (5) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour;
- (b) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds.
- (1) Dry material handling with PM emissions less than 5 tons/year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from R & D boiler # 1, # 2, and # 3, all constructed in 1994, and each rated at 5.5, 5.5, and 5.0 mmBtu/hr respectively, shall be limited to 0.434 lbs PM/mmBtu. PM emissions from Cleaver Brooks western standby boiler, constructed in 1998, and rated at 4.0 mmBtu/hr, shall be limited to 0.422 lbs PM/mmBtu.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per mmBtu heat input  
Q = total source max. operation capacity rating (at the time when the boilers were constructed) = 38.45 mmBtu/hr

#### D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the three (3) natural gas fired boilers, identified as Cleaver Brooks boilers # 2, and Cleaver Brooks western primary boiler, and Weil Mclain Co. boiler, all constructed before 1972, and each rated at 4.18, 4.0 and 1.65 mmBtu/hr, respectively, shall each be limited to 0.8 lbs PM/mmBtu.



- (b) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the two (2) natural gas fired boilers, identified as Cleaver Brooks boiler #1 and Bryan Steam Corp. boiler, both constructed after 1972, and each rated at 8.36 and 0.25 mmBtu/hr, respectively, shall each be limited to 0.6 lbs PM/mmBtu.

**D.2.3 Particulate Matter (PM) [326 IAC 6-3]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the dry material handling shall not exceed the pound per hour emission rate established as E in the following formula:

The pounds per hour limitation of 0.75 lbs PM/hr was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

$$E = 4.10 (0.079 \text{ TPH})^{0.67} = 0.75 \text{ lbs PM/hr}$$

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

Currently there are no Compliance Monitoring Requirements applicable to these emission units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
AND THE EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Red Spot Paint and Varnish Co., Inc  
Source Address: 1016 East Columbia St., Evansville, IN 47711  
Mailing Address: 1016 East Columbia St., Evansville, IN 47711  
Part 70 Permit No.: T163-7524-00018

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**and the Evansville Environmental Protection Agency**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Red Spot Paint and Varnish Co., Inc.  
Source Address: 1016 East Columbia St., Evansville, IN 47711  
Mailing Address: 1016 East Columbia St., Evansville, IN 47711  
Part 70 Permit No.: T163-7524-00018

**This form consists of 2 pages**

**Page 1 of 2**

- |   |  |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12)   |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and            |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
AND THE EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Red Spot Paint and Varnish Co., Inc.  
Source Address: 1016 East Columbia St., Evansville, IN 47711  
Mailing Address: 1016 East Columbia St., Evansville, IN 47711  
Part 70 Permit No.: T163-7524-00018

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and the Evansville Environmental Protection Agency**

**Technical Support Document (TSD) for a Part 70 Operating Permit**

**Source Background and Description**

**Source Name:** Red Spot Paint and Varnish Co., Inc  
**Source Location:** 1016 East Columbia St., Evansville, IN 47711  
**County:** Vanderburgh  
**SIC Code:** 2851  
**Operation Permit No.:** T163-7524-00018  
**Permit Reviewer:** Adeel Yousuf/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Red Spot Paint and Varnish Co., Inc. relating to the operation of mixing and blending of paints, varnishes, thinners and lacquers.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of 4000 gallons;
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons;
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons;
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons;
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons;
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons;
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons;
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons;
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons;
- (c) one (1) solvent tank farm, identified as tank farm # 4, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF4-1, TF4-2 and TF4-3, TF4-1 and TF4-2 with a maximum capacity of 2,100 gallons, and TF3-3 with a maximum capacity of 2,100 gallons;

- (2) four (4) fixed roof dome tanks, identified as TF4-4, TF4-5, TF4-6 and TF4-7, each with a maximum capacity of 2,300 gallons;
- (d) one (1) solvent tank farm, identified as tank farm # 3, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) one (1) fixed roof dome tank, identified as TF3-1, with a maximum capacity of 3,500 gallons;
  - (2) two (2) fixed roof dome tanks, identified as TF3-2 and TF3-3, each with a maximum capacity of 2,500 gallons;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of 21,885,000 lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
  - (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of 57,120,000 lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
  - (a) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (b) five (5) general exhaust ducts;
  - (c) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of 22,995,000 lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
  - (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;
- (h) portable mix tanks and totes consisting of:
  - (1) one hundred and forty six (146) portable mix tanks with capacities ranging from 6 to 55 gallons;
  - (2) forty eight (48) portable mix tanks with capacities ranging from 56 to 99 gallons;
  - (3) seventy one (71) portable mix tanks with capacities ranging from 100 to 199 gallons;
  - (4) thirty seven (37) portable mix tanks with capacities ranging from 200 to 299 gallons;
  - (5) thirty four (34) portable mix tanks with capacities ranging from 300 to 399 gallons;
  - (6) nine (9) portable mix tanks with capacities ranging from 400 to 499 gallons;
  - (7) eight (8) portable mix tanks with capacities ranging from 500 to 605 gallons;
  - (8) forty (40) portable mix totes, each with a maximum capacity of 99 gallons;
  - (9) twenty (20) portable mix totes with capacities ranging from 100 to 299 gallons;
  - (10) fifty (50) portable mix totes with capacities ranging from 300 to 500 gallons;
  - (11) twenty (20) portable mix totes with capacities ranging from 501 to 605 gallons;
- (i) one (1) waste processing facility, identified as building # 8, installed in 1967, with a maximum throughput rate of 2,149,719 lbs per year, consisting of 5 general exhaust ducts, and exhausting to stack SV8-1; and



- (j) one (1) mixing operation, identified as nextel manufacturing building # 14, installed in 1967, with a maximum production rate of 5200 gallons per year, exhausting to stack SV14-8, and consisting of:
  - (a) three (3) mixing stations, identified as 68, 69 and 70, each with a maximum capacity of 700 gallons;
  - (b) three (3) general exhaust ducts.

### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968;
  - (2) two (2) Cleaver Brooks natural gas fired boilers located in building # 6, identified as western primary boiler, installed in 1965, and western standby boiler, installed in 1998, each rated at 4.0 mmBtu per hour;
  - (3) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour;
  - (4) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour;
  - (5) one (1) natural gas fired boiler located in building # 14, identified as Bryan Steam Corp. boiler, installed in 1982, and rated at 0.25 mmBtu per hour;
  - (6) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour;
- (b) Paved and unpaved roads and parking lots with public access;
- (c) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
  - (1) one (1) natural gas fired emergency generator, identified as Onan-Cummins-Genset at 134 horsepower;
- (d) Stationary fire pumps,
  - (1) one (1) emergency diesel powered fire pump, identified as Cummins Engine co., model # 6 BTA 5.9 F1;
- (e) five (5) laboratory operations as defined in 326 IAC 2-7-1 (20)(C),
  - (1) one (1) laboratory, identified as QAQC lab building # 3, and consisting of:
    - (a) two (2) Devilbiss wash water spray booths, identified as # 1 and 2;
    - (b) four (4) binks dry filter back spray booths, identified as # 3 and 6;
    - (c) three (3) milling units, identified as # 34 and 36;
    - (d) one (1) lab hood;
    - (e) six (6) lab ovens;
    - (f) eight (8) general exhaust ducts;
  - (2) one (1) laboratory, identified as building # 3 south, and consisting of:
    - (a) one (1) devilbiss wash water spray booth, identified as # 7;
    - (b) four (4) lab hoods;
    - (c) two (2) lab ovens;
    - (d) twenty eight (28) general exhaust ducts;

- (3) one (1) laboratory, identified as UV/VM research, building # 5, and consisting of:
  - (a) one (1) devilbiss wash water spray booth, identified as # 74;
  - (b) two (2) dry filter back spray booths, identified as # 76 and 88;
  - (c) one (1) flow coater unit, identified as # 75;
  - (d) four (4) lab ovens;
  - (e) fifteen (15) test equipment drops;
  - (f) three (3) general exhaust ducts;
- (4) one (1) laboratory, identified as R & D facility, building # 7, and consisting of:
  - (a) two (2) devilbiss wash water spray booths, identified as # 14 and 17;
  - (b) eight (8) binks dry filter back spray booths, identified as # 8 and 16;
  - (c) four (4) pilot scale milling units;
  - (d) one (1) tint dispenser, identified as # 101;
  - (e) seventeen (17) lab hoods;
  - (f) twenty seven (27) lab ovens;
  - (g) ten (10) test equipment drops;
  - (h) thirteen (13) general exhaust ducts;
- (5) one (1) laboratory, identified as nextel manufacturing building # 14, and consisting of:
  - (a) one (1) dry filter back spray booth, identified as # 71;
  - (b) one (1) nextel dryer unit;
  - (c) one (1) filter belt;
  - (d) one (1) centrifuge;
  - (e) one (1) hot room;
  - (f) three (3) lab hoods;
  - (g) three (3) general exhaust ducts; and
- (f) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds
  - (1) Dry material handling with PM emissions less than 5 tons/year.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Evansville EPA Certificate of Operation 018-001-001, issued on March 19, 1996;
- (b) Evansville EPA Certificate of Operation 018-002-001, issued on March 19, 1996;
- (c) Evansville EPA Certificate of Operation 018-003-001, issued on March 19, 1996;
- (d) Evansville EPA Certificate of Operation 018-003-002, issued on March 19, 1996;
- (e) Evansville EPA Certificate of Operation 018-003-003, issued on March 19, 1996;
- (f) Evansville EPA Certificate of Operation 018-003-004, issued on March 19, 1996;
- (g) Evansville EPA Certificate of Operation 018-003-007, issued on March 19, 1996;
- (h) Evansville EPA Certificate of Operation 018-004-001, issued on March 19, 1996;
- (i) Evansville EPA Certificate of Operation 018-005-001, issued on March 19, 1996;
- (j) Evansville EPA Certificate of Operation 018-006-001, issued on March 19, 1996;
- (k) Evansville EPA Certificate of Operation 018-007-001, issued on March 19, 1996;
- (l) Evansville EPA Certificate of Operation 018-007-002, issued on March 19, 1996;
- (m) Evansville EPA Certificate of Operation 018-008-001, issued on March 19, 1996;
- (n) Evansville EPA Certificate of Operation 018-009-001, issued on March 19, 1996;
- (o) Evansville EPA Certificate of Operation 018-011-001, issued on March 19, 1996;
- (p) Evansville EPA Certificate of Operation 018-011-002, issued on March 19, 1996;
- (q) Evansville EPA Certificate of Operation 018-011-003, issued on March 19, 1996;
- (r) Evansville EPA Certificate of Operation 018-011-004, issued on March 19, 1996;
- (s) Evansville EPA Certificate of Operation 018-012-001, issued on March 19, 1996;
- (t) Evansville EPA Certificate of Operation 018-014-001, issued on March 19, 1996;
- (u) Evansville EPA Certificate of Operation 018-014-002, issued on March 19, 1996;
- (v) Evansville EPA Certificate of Operation 018-015-001, issued on March 19, 1996; and

(w) Evansville EPA Certificate of Operation 018-016-001, issued on March 19, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

A notice of completeness letter was mailed to the source on December 30, 1996.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 17.)

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Toluene	greater than 10
Xylene	greater than 10
Methy Ethyl Ketone	greater than 10
Ethyl Benzene	greater than 10
Methy Isobutyl Ketone	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.058
PM-10	0.088
SO <sub>2</sub>	0.0117
VOC	129.75
CO	0.39
NO <sub>x</sub>	0.39
HAP *	35.0

\* HAPs emissions calculated based on the information provided by the source

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Tank Farms (# 1, # 2, # 3 and # 4)	0.00	0.00	0.00	3.21	0.00	0.00	3.21
Production Mix & Blend Operations (building # 1, # 2 and # 3)	0.00	0.00	0.00	143.72	0.00	0.00	39.52
Waste Mix & Blend Operation (building # 8)	0.00	0.00	0.00	13.97	0.00	0.00	6.99
Solvent Cleaning Emissions	0.00	0.00	0.00	3.03	0.00	0.00	3.03
Inline Emissions	0.00	0.00	0.00	28.49	0.00	0.00	7.69
Insignificant Activities	2.21	3.17	0.10	0.94	14.19	16.84	0.32
<b>Total Emissions</b>	<b>2.21</b>	<b>3.17</b>	<b>0.10</b>	<b>193.36</b>	<b>14.19</b>	<b>16.84</b>	<b>60.76</b>

Note:

Calculations of PTE were based on the maximum production rates (with maximum operating hours of 8760 hours per year), provided by the source.

### County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as maintenance or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Federal Rule Applicability

- (a)
  - (1) The storage fixed roof dome tanks in tank farms # 1 and # 2, constructed in 1930 and 1963 respectively, are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart K), because the tank farms # 1 and # 2 were constructed before the rule applicability date of June 11, 1973 and the fixed roof dome tanks have storage capacities less than 40,000 gallons.
  - (2) The remaining storage fixed roof dome tanks in tank farms # 3 and # 4, both constructed in 1980 are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart K), because the fixed roof dome tanks have storage capacities less than 40,000 gallons.
- (b)
  - (1) The storage fixed roof dome tanks in tank farms # 1 and # 2, constructed in 1930 and 1963 respectively, are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart Ka), because all of the fixed roof dome tanks were constructed prior to the rule applicability date of May 18, 1978 and have not been reconstructed or modified prior to July 23, 1984.
  - (2) The remaining storage fixed roof dome tanks in tank farms # 3 and # 4, both constructed in 1980, are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart Ka), because all the fixed roof dome tanks have storage capacities less than 40,000 gallons, and have not been reconstructed or modified prior to July 23, 1984.
- (c)
  - (1) The seven (7) fixed roof dome tanks in tank farm # 1, installed in 1930's, identified as TF1-1 to TF1-5, TF1-8 and TF1-9, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.112b, Subpart Kb), because the fixed roof dome tanks were constructed or modified prior to the July 23, 1984 applicability date.
  - (2) The remaining storage fixed roof dome tanks in tank farms # 1, 2, 3 and 4, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.112b, Subpart Kb), because the capacities of each of the fixed roof dome tanks are less than 40 cubic meters.
- (d) The nine (9) natural gas fired boilers identified as R&D boilers #1, #2 and #3, Cleaver Brooks boilers #1 and #2, Cleaver Brooks western primary boiler, Cleaver Brooks western standby boiler, Bryan Steam Corp boiler and Weil Mclain Co. boiler are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because each boiler's capacity is less than 10 MMBtu per hour.

- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. However, the US EPA has established (Manufacture of Paints, Coatings, and Adhesives) as a source category requiring HAP control and established November 15, 2000 as the final rule promulgation date. The source will evaluate applicability to the rule upon its promulgation and will comply with the applicable rules.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source with the potential to emit of VOC greater than 250 tons per 12-month period and constructed before the rule applicability date of August 7, 1977 is not subject to 326 IAC 2-2 (PSD). Each of the following modifications at the source after August 7, 1977, has less than 40 tons per year of VOC emissions.

- a) Construction of tank farm # 3 in 1980, consisting of seven (7) tanks, identified as TF3-1, TF3-2, TF3-3, TF3-4, TF3-5, TF3-6 and TF3-7, and tank farm # 4 also constructed in 1980, consisting of three (3) tanks, identified as TF4-1, TF4-2, TF4-3.
- b) One (1) Cleaver Brooks natural gas fired boiler in building # 3, identified as boiler # 1, rated at 8.36 mmBtu per hour, and installed in 1978.
- c) One (1) Cleaver Brooks natural gas fired boiler in building # 6, identified as western standby boiler, rated at 4.0 mmBtu per hour, and installed in 1998.
- d) Three (3) Cleaver Brooks natural gas fired boilers in building # 7, identified as R & D boiler # 1, # 2, and # 3, each rated at 5.5, 5.5 and 5.0 mmBtu per hour respectively, and installed in 1994.
- e) One (1) natural gas fired boiler in building # 14, identified as Bryan Steam Corp. boiler, rated at 0.25 mmBtu per hour, and installed in 1982.

Also, this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

##### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on December 12, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Vanderburgh County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

##### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), for this source located in Evansville, Vanderburgh County, opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Individual Facilities

### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the handling of dry materials when operating at a process weight rate of 0.079 tons per hour shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (0.079 \text{ TPH})^{0.67} = 0.75 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the handling of dry material shall be limited to 0.75 pounds PM per hour.

#### Compliance calculation:

$$(1.892 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.43 \text{ lbs PM/hr}$$

The handling of dry material operation will comply with the requirements of 326 IAC 6-3-2.

### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four (4) natural gas fired boilers, identified as Cleaver Brooks western standby boiler, R & D boiler #1, R & D boiler #2 and R & D boiler #3 (all constructed after 1983), each rated at 4.0, 5.5, 5.5 and 5.0 MMBtu per hour, respectively, are subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per mmBtu heat input  
Q = total source max. operation capacity rating (at the time when the boilers were constructed)

For R&D boiler #1, #2 and #3, all three constructed in 1994 ( $Q = 18.45 + 5.5 + 5.5 + 5.0 = 34.45$ )  
 $Pt = 1.09/34.45^{0.26} = 0.434 \text{ lbs PM/mmBtu}$

For Cleaver Brooks western standby boiler, constructed in 1998 ( $Q = 34.45 + 4.0 = 38.45$ )  
 $Pt = 1.09/38.45^{0.26} = 0.422 \text{ lbs PM/mmBtu}$

#### compliance calculation:

Potential PM emissions for all four boilers =  $1.9 \text{ lb PM/mmCF} * (1/1000) (\text{mmCF/mmBtu}) = 0.0019 \text{ lbs PM/mmBtu}$ .

Potential PM emissions for western standby boiler, R & D boiler #1, #2 and #3 (0.0019 lbs PM/mmBtu) are less than allowable 0.434 lbs PM/mmBtu and 0.422 lbs PM/mmBtu for R&D boilers #1, #2, #3 and Cleaver Brooks western standby boiler, respectively. Therefore the four (4) boilers will comply with the requirements of 326 IAC 6-2-4.



### 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The five (5) natural gas fired boilers identified as Cleaver Brooks boilers #1 and #2, Cleaver Brooks western primary boiler, Bryan Steam Corp boiler and Weil Mclain Co. boiler (all constructed before 1983), each rated at 8.36, 4.18, 4.0, 0.25, and 1.65 mmBtu/hr, respectively, are subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m<sup>3</sup>  
 Pt = emission rate limit (lbs/mmBtu)  
 Q = total source heat input capacity (mmBtu/hr)  
 N = number of stacks  
 a = plume rise factor (0.67)  
 h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times P_{a_i} \times Q_i}{\sum_{i=1}^N P_{a_i} \times Q_i}$$

where: Pa = the actual controlled emissions rate in lb/mmBtu using the emission factor form AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For Cleaver Brooks boiler #2, Cleaver Brooks western primary boiler, and Weil Mclain co. boiler, all constructed before 1972 (Q = 4.18+4.0+1.65=9.83 mmBtu/hr)  
 Pt = (50\*0.67\*34)/(76.5\*9.83<sup>0.75</sup>\*3<sup>0.25</sup>) = 2.03 lbs PM/mmBtu

However, per 326 IAC 6-2-3(d), Pt for indirect heating facilities constructed before 1972 shall not exceed 0.8 lbs PM/mmBtu, therefore the two (2) boilers identified as Cleaver Brooks boiler # 2, and Weil Mclain Co. boiler are limited to 0.8 lbs PM/mmBtu.

#### compliance calculation:

Potential PM emissions for three (3) boilers = 1.9 lb PM/mmCF \* (1/1000) (mmCF/mmBtu) = 0.0019 lbs PM/mmBtu.

Potential PM emissions for Cleaver Brooks boiler # 2, Cleaver Brooks western primary boiler and Weil Mclain Co. boiler (0.0019 lbs PM/mmBtu) are less than the allowable 0.8 lbs PM/mmBtu, therefore the two (3) boilers identified as Cleaver Brooks boiler # 2, Cleaver Brooks western primary boiler, and Weil Mclain Co. boiler will comply with the requirements of 326 IAC 6-2-3.

For Cleaver Brooks boiler #1, constructed in 1978 (Q = 9.83+8.36 = 18.19 mmBtu/hr)  
 Pt = (50\*0.67\*34)/(76.5\*18.19<sup>0.75</sup>\*4<sup>0.25</sup>) = 1.19 lbs PM/mmBtu

For Bryan Steam Corp boiler, constructed in 1982 ( $Q = 18.19 + 0.25 = 18.44$  mmBtu/hr)  
 $Pt = (50 * 0.67 * 34) / (76.5 * 18.44^{75} * 5^{0.25}) = 1.11$  lbs PM/mmBtu

Pursuant to 326 IAC 6-2-3(e), Pt for indirect heating facilities constructed after 1972 shall not exceed 0.6 lbs PM/mmBtu, therefore the remaining two (2) boilers identified as Cleaver Brooks boilers #1, and Bryan Steam Corp. boiler are limited to 0.6 lbs PM/mmBtu.

compliance calculation:

Potential PM emissions for three boilers =  $1.9 \text{ lb PM/mmCF} * (1/1000) (\text{mmCF/mmBtu}) = 0.0019$  lbs PM/mmBtu.

Potential PM emissions for Cleaver Brooks boiler #1, and Bryan Steam Corp. boiler (0.0019 lbs PM/mmBtu) are less than the allowable 0.6 lbs PM/mmBtu, therefore the three (3) boilers identified as Cleaver Brooks boiler # 2, Weil Mclain Co. boiler, and Bryan Steam Corp. boiler will comply with the requirements of 326 IAC 6-2-3.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Provisions of 326 IAC 8-1-6 applies to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential emissions of 25 tons/yr or greater. All the effected facilities at the source were constructed prior to January 1, 1980, except the tank farms # 3 and # 4. The tank farms constructed in 1980, have potential VOC emissions less than 25 tons/yr and are therefore not subject to the requirements of 326 IAC 8-1-6.

326 8-4 (Petroleum Sources)

This Organic liquid storage operation is not subject to the provisions of this rule. The tank farms # 3 and # 4 constructed in 1980, are not used to store petroleum liquid. Also, the source is located in Vanderburgh County and therefore not subject to the requirements of 326 IAC 8-4

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. All the effected facilities at the source were constructed prior to October 7, 1974, except the tank farms # 3 and # 4. The tank farms constructed in 1980, have potential VOC emissions less than 100 tons/yr and are therefore not subject to the requirements of 326 IAC 8-6.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. The source is located in Vanderburgh County and therefore not subject to the requirements of 326 IAC 8-9-1.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements for the source.

## Conclusion

The operation of this mixing and blending of paints, varnishes, thinners and lacquers shall be subject to the conditions of the attached proposed **Part 70 Permit No. T163-7524-00018**.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
the Evansville Environmental Protection Agency**

**Addendum to the  
Technical Support Document for a Part 70 Operating Permit**

**Source Name:** Red Spot Paint and Varnish Co., Inc  
**Source Location:** 1016 East Columbia St., Evansville, IN 47711  
**SIC Code:** 2851  
**County:** Vanderburgh  
**Operation Permit No.:** T163-7524-00018  
**Permit Reviewer:** Adeel Yousuf /EVP

On December 18, 2000, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Red Spot Paint and Varnish Co., Inc. had applied for a Title V permit relating to the operation of mixing and blending of paints, varnishes, thinners and lacquers. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 16, 2001, Susan D. Henry, Environmental, Health & Safety Affairs Manager at Red Spot Paint and Varnish Co., Inc. submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

**Comment 1**

Section A.2 of the draft part 70 OP provides descriptions of the equipment at Red Spot, including tank sizes and contents. While the sizes of the tanks listed in Section A.2 are fixed, there are no applicable requirements specifying the types of solvents that can be stored in each vessel. Consequently, the types of solvents/raw materials stored in the tanks may vary. Therefore, although the information provided in Sections A.1 through A.3 is "descriptive information and does not represent enforceable conditions", Red Spot requests that the referenced associations of individual solvents/raw materials with specific storage vessels be eliminated from the OP.

The associated descriptions in Section D should also be amended to reflect changes made to Section A.2. Additionally, change identification number of tank farms: tank farm # 3 to # 4 and tank farm #4 to #3.

**Response 1**

Facility descriptions are not federally enforceable. The descriptions are used to calculate and determine the source's potential to emit. OAQ determined that descriptions of tank contents need not be included in the facility descriptions. The following changes have been made to TSD, Section A.2, Section D.1- Facility Description and condition D.1.2 New Facilities; General Reduction Requirements.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons ~~for storing butyl acetate, methyl ethyl ketone, washup # 1 and washup # 2, respectively;~~
  - (2) one (1) fixed roof dome tank, identified as TF1-5, with a maximum capacity of 15,000 gallons ~~for storing di-isobutyl ketone;~~
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons ~~for storing isopropanol, butanol, 587 naptha and methyl amyl ketone, respectively;~~
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons ~~for storing mineral spirits and aromatic 150, respectively;~~
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons ~~for storing heptane, shell 340, and PM acetate, respectively;~~
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons ~~for storing methyl isobutyl ketone, diacetone alcohol, isopropyl acetate, aromatic 100, butyl cellosolve, acetone, 587 naptha, and xylene, respectively;~~
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons ~~for storing methyl ethyl ketone;~~
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons ~~for storing dowanol PM and toluene;~~
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons ~~for storing isopropyl acetate and butanol, respectively;~~
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons ~~for storing butyl acetate;~~
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons ~~for storing isobutyl isobutyrate;~~
- (c) one (1) solvent tank farm, identified as tank farm # ~~3~~ 4, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF3 ~~4~~-1, TF3 ~~4~~-2 and TF3 ~~4~~-3, TF3 ~~4~~-1 and TF3 ~~4~~-2 with a maximum capacity of 2,100 gallons ~~for storing syn 2026, and TF3-3 with a maximum capacity of 2,100 gallons for storing of 600-SL 8544;~~
  - (2) four (4) fixed roof dome tanks, identified as TF3 ~~4~~-4, TF3 ~~4~~-5, TF3 ~~4~~-6 and TF3 ~~4~~-7, each with a maximum capacity of 2,300 gallons ~~for storing syn 634;~~
- (d) one (1) solvent tank farm, identified as tank farm # ~~4~~ 3, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) one (1) fixed roof dome tank, identified as TF~~4~~ ~~3~~-1, with a maximum capacity of 3,500 gallons ~~for storing SV 4162 solvent;~~

- (2) two (2) fixed roof dome tanks, identified as TF4 3-2 and TF4 3-3, each with maximum capacity of 2,500 gallons ~~for storing SV 3846 solvent and SV 4101,~~ respectively;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of ~~95,452,756~~ **21,885,000** lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
  - (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of ~~241,823,304~~ **57,120,000** lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
  - (1) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (2) five (5) general exhaust ducts;
  - (3) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of ~~96,340,498~~ **22,995,000** lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
  - (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
- (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons for storing butyl acetate, methyl ethyl ketone, washup # 1 and washup # 2, respectively;
  - (2) one (1) fixed roof dome tank, identified as TF1-5, with a maximum capacity of 15,000 gallons for storing di-isobutyl ketone;
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons for storing isopropanol, butanol, 587 naptha and methyl amyl ketone, respectively;
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons for storing mineral spirits and aromatic 150, respectively;
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
- (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons for storing heptane, shell 340, and PM acetate, respectively;
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons for storing methyl isobutyl ketone, diacetone alcohol, isopropyl acetate, aromatic 100, butyl cellosolve, acetone, 587 naptha, and xylene, respectively;
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons for storing methyl ethyl ketone;
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons for storing dowanol PM and toluene;
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons for storing isopropyl acetate and butanol, respectively;
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons for storing butyl acetate;
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons for storing isobutyl isobutyrate;
- (c) one (1) solvent tank farm, identified as tank farm # 3 4, installed in 1980, exhausting to the atmosphere, and consisting of:
- (1) three (3) fixed roof dome tanks, identified as TF3 4-1, TF3 4-2 and TF3 4-3, TF3 4-1 and TF3 4-2 with a maximum capacity of 2,100 gallons for storing syn 2026, and TF3-3 with a maximum capacity of 2,100 gallons for storing of 600 SL 8544;
  - (2) four (4) fixed roof dome tanks, identified as TF3 4-4, TF3 4-5, TF3 4-6 and TF3 4-7, each with a maximum capacity of 2,300 gallons for storing syn 634;

- (d) one (1) solvent tank farm, identified as tank farm # 4 3, installed in 1980, exhausting to the atmosphere, and consisting of:
- (1) one (1) fixed roof dome tank, identified as TF4 3-1, with a maximum capacity of 3,500 gallons ~~for storing SV 4162 solvent~~;
  - (2) two (2) fixed roof dome tanks, identified as TF4 3-2 and TF4 3-3, each with a maximum capacity of 2,500 gallons ~~for storing SV 3846 solvent and SV 4101, respectively~~;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of ~~95,452,756~~ **21,885,000** lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
- (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of ~~241,823,304~~ **57,120,000** lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
- (1) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (2) five (5) general exhaust ducts;
  - (3) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of ~~96,310,498~~ **22,995,000** lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
- (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;

**D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]**

Any change or modification to the tank farms # 3 and # 4 that may increase the PTE of VOC from these tank farms to more than 25 tons per year, or any change in the vapor pressures (at 20°C) of each organic liquid stored that may exceed the following shall obtain approval from OAQ and the Evansville Environmental Protection Agency before such changes can be made.

- (1) 14.78 psi for tank TF3-4-1 and TF3-4-2;
- (2) 4.49 psi for tank TF3-4-3;
- (3) 15.0 psi for tank TF3-4-4, TF3-4-5, TF3-4-6 and TF3-4-7;
- (4) 36.9 psi for tank TF4-3-1;
- (5) 5.60 psi for tank TF4-3-2;
- (6) 8.50 psi for tank TF4-3-3.



The following revisions have been made to the Technical Support Document under the Permitted Emission Units and Pollution Control Equipment section (**bolded** language has been added, the language with a line through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons ~~for storing butyl acetate, methyl ethyl ketone, washup # 1 and washup # 2, respectively;~~
  - (2) one (1) fixed roof dome tank, identified as TF1-5, with a maximum capacity of 15,000 gallons ~~for storing di-isobutyl ketone;~~
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons ~~for storing isopropanol, <sup>2</sup>butanol, 587 naptha and methyl amyl ketone, respectively;~~
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons ~~for storing mineral spirits and aromatic 150, respectively;~~
- (b) one (1) solvent tank farm, identified as tank farm # 2, installed in 1963, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF2-1A, TF2-1B and TF2-1C, each with a maximum capacity of 2,610 gallons ~~for storing heptane, shell 340, and PM acetate, respectively;~~
  - (2) eight (8) fixed roof dome tanks, identified as TF2-2A, TF2-2B, TF2-3A, TF2-3B, TF2-4A, TF2-4B, TF2-5A, and TF2-5B, each with a maximum capacity of 4,040 gallons ~~for storing methyl isobutyl ketone, diacetone alcohol, isopropyl acetate, aromatic 100, butyl cellosolve, acetone, 587 naptha, and xylene, respectively;~~
  - (3) one (1) fixed roof dome tank, identified as TF2-6A, with a maximum capacity of 8,370 gallons ~~for storing methyl ethyl ketone;~~
  - (4) two (2) fixed roof dome tanks, identified as TF2-6B and TF2-6C, each with a maximum capacity of 4,180 gallons ~~for storing dowanol PM and toluene;~~
  - (5) two (2) fixed roof dome tanks, identified as TF2-7 and TF2-9, each with a maximum capacity of 6,050 gallons ~~for storing isopropyl acetate and butanol, respectively;~~
  - (6) one (1) fixed roof dome tank, identified as TF2-8, with a maximum capacity of 6,000 gallons ~~for storing butyl acetate;~~
  - (7) one (1) fixed roof dome tank, identified as TF2-10, with a maximum capacity of 1,500 gallons ~~for storing isobutyl isobutyrate;~~
- (c) one (1) solvent tank farm, identified as tank farm # ~~3~~ **4**, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) three (3) fixed roof dome tanks, identified as TF3 ~~4~~-1, TF3 ~~4~~-2 and TF3 ~~4~~-3, TF3 ~~4~~-1 and TF3 ~~4~~-2 with a maximum capacity of 2,100 gallons ~~for storing syn 2026, and TF3-3 with a maximum capacity of 2,100 gallons for storing of 600-SL 8544;~~
  - (2) four (4) fixed roof dome tanks, identified as TF3 ~~4~~-4, TF3 ~~4~~-5, TF3 ~~4~~-6 and TF3 ~~4~~-7, each with a maximum capacity of 2,300 gallons ~~for storing syn 634;~~

- (d) one (1) solvent tank farm, identified as tank farm # ~~4~~ **3**, installed in 1980, exhausting to the atmosphere, and consisting of:
  - (1) one (1) fixed roof dome tank, identified as TF~~4~~ **3**-1, with a maximum capacity of 3,500 gallons ~~for storing SV 4162 solvent~~;
  - (2) two (2) fixed roof dome tanks, identified as TF~~4~~ **3**-2 and TF~~4~~ **3**-3, each with a maximum capacity of 2,500 gallons ~~for storing SV 3846 solvent and SV 4101, respectively~~;
- (e) one (1) blending operation, identified as UV/VM production building # 1, installed in 1930's, with a maximum production rate of ~~95,452,756~~ **21,885,000** lbs per year, exhausting to the stacks SV1-1, SV1-2 and SV1-16, and consisting of:
  - (1) seven (7) mixing stations, identified as # 60 thru 66, with maximum capacities ranging from 700 to 2,500 gallons;
  - (2) four (4) test equipment drops;
  - (3) fourteen (14) general exhaust ducts;
- (f) one (1) blending operation, identified as lacquer production building # 2, installed in 1963, with a maximum production rate of ~~241,823,304~~ **57,120,000** lbs per year, exhausting to the stacks SV2-1, SV2-2, SV2-3, SV2-4, and SV2-5AB, and consisting of:
  - (1) nine (9) mixing stations, identified as # 51 thru 59, with maximum capacities ranging from 500 to 1,221 gallons;
  - (2) five (5) general exhaust ducts;
  - (3) four (4) manhole exhaust vents;
- (g) one (1) production operation, identified as main production building # 3, installed in 1967, with a maximum production rate of ~~96,340,498~~ **22,995,000** lbs per year, exhausting to the stacks SV3-1 thru SV3-17, SV3-18ABC, SV3-19, SV3-20, SV3-21ABC, SV3-22, and SV3-23, and consisting of:
  - (1) nineteen (19) mixing stations, identified as # 18 thru 30 and # 89 thru 94, with maximum capacities ranging from 700 to 2500 gallons;
  - (2) seventeen (17) milling units, identified as #'s 31-33 and 37-50;
  - (3) two (2) bucket filling machines, identified as # 97 and 98;
  - (4) one (1) tote cleaning unit, identified as # 72;
  - (5) one (1) tank cleaning unit, identified as # 73;
  - (6) one (1) metal dust collector, identified as # 100;
  - (7) twenty (20) general exhaust ducts;
  - (8) eight (8) manhole exhaust vents;

## Comment 2

Section D.2 contains conditions for the natural gas fired combustion sources and dry material handling processes at the facility. The compliance monitoring section indicates, "Currently there are no Compliance Monitoring Requirements applicable to these emission units."

Red Spot would like to clarify this section with the following additions, "Currently there are no Compliance Monitoring Requirements applicable to these emission units due to the fact that the emission factors for PM from natural gas combustion in lbs PM/MMBtu are less than the limits allowed by 326 IAC 6-2-4 and 326 IAC 6-2-3."

## Response 2

OAQ decided that it is not necessary to include the additional statement in D.2 section of the Title V permit. Title V Technical Support Document (TSD) already mentions under State Rule Applicability-Individual Facilities- that the boilers will comply with the rules 326 IAC 6-2-4 and 326 IAC 6-2-3. No changes have been made to the permit as a result of this comment.

### **Comment 3**

## **TECHNICAL SUPPORT DOCUMENT**

### **Potential To Emit**

The Technical Support Document (TSD) for the Part 70 Operating Permit (OP) contains a section summarizing the facility's potential to emit (PTE) for criteria pollutants and hazardous air pollutants (HAPs). Red Spot has reviewed the PTE calculations associated with the TSD and has determined that the calculations presented on page 7 dramatically over estimate the PTE for volatile organic compounds (VOC) and HAPs. Furthermore, a PTE of over 2,200 tons per year (TPY) results in the Evansville facility being considered a major stationary source under the federal New Source Review program as well (i.e., 250 TPY). Red Spot believes that this is an inappropriate classification for the facility. The PTE calculations associated with the TSD represent an overestimation based on two parameters; (1) the emission factors utilized and (2) the production capacity of the facility.

### **Emission Factors**

The coating manufacturing process involves the use of VOC containing raw materials to produce a product of which VOCs are an integral component. Therefore, coating manufacturers like Red Spot strive to minimize the losses of VOCs during production.

The emission factor, utilized in the existing PTE calculations, suggests that 2% of the VOCs used are emitted during the production of the coatings. Based on Red Spot's experience, the emissions from production of the coatings are significantly less than 2% of the VOCs.

Red Spot utilizes mainly closed totes in the production of its coatings. However, open topped mixing vessels are still in existence in the Evansville facility. Red Spot has performed mass balance analyses to determine the amount of volatile organic compounds (VOCs) emitted during the production of coatings in both open topped and closed tote systems at another facility. By measuring the mass of the raw materials used in production, and measuring the total mass of the finished product, Red Spot was able to determine the amount of VOCs emitted in each type of operation. Based on the mass balance analyses, VOC emissions from open topped and closed totes are 1.25% and 0.29% of the VOCs utilized, respectively. As a result, the PTE has been substantially overestimated because a majority of the production is performed in the closed totes.

### **Production Capacity**

The production capacity presented in the TSD was based solely on the capacity (gallons) of all of the mixing vessels at the Evansville facility, and the assumption that they are all operated simultaneously. However, due to the nature of the coating manufacturing process, this does not represent an accurate estimate of capacity. The production capacity is impacted by:

- the fact that at any given time, a number of the vessels are being cleaned, or are waiting to be cleaned,
- some vessels will be utilized to produce intermediates and tints, and
- the floor space available to operate the mixing vessels limits the number that can operate at a given time.

Another factor that affects the production capacity is the time required to produce a batch of coating, which is in turn affected by such things as the type of coating produced, the quantity of a single batch, and the number of intermediates and tints utilized.

Based on operating experience, the above factors and the capacity of the mixing vessels at the Evansville facility, Red Spot has conservatively assessed the production capacity at 12,000,000 gallons of coating per year, approximately four times the current production levels. This, as well as the emission factors presented above, provides a more accurate estimate of PTE for the facility.

The ratio of the capacities of closed to open mixing vessels at the Evansville facility is 71.5% to 28.5%. Based on this ratio and the maximum potential production capacity, the PTE for VOCs from the production of coatings is:

$$(12e^6 \text{ gal})(0.715)(8.5 \text{ lb/gal})(0.5 \text{ lb VOC/lb})(0.0029 \text{ lb emissions/lb VOC})(1 \text{ ton}/2,000 \text{ lb}) + \\ (12e^6 \text{ gal})(0.285)(8.5 \text{ lb/gal})(0.5 \text{ lb VOC/lb})(0.0125 \text{ lb emissions/lb VOC})(1 \text{ ton}/2,000 \text{ lb}) = \\ \mathbf{143.7 \text{ TPY VOC}}$$

A review of the coating raw materials utilized at Red Spot indicates that the VOC may consist of up to 27.5% HAPs. Therefore, the PTE for aggregate HAPs is:  
 $(143.7 \text{ TPY})(0.275) = \mathbf{39.5 \text{ TPY HAP}}$

Please consider this to be an official request for a revision to the TSD. The revision should reduce the PTE for VOC from 2,293 TPY to 193.34 TPY in the TSD. Additionally, the PTE for HAPs should be reduced from 631 TPY to 60.74 TPY in the TSD. The General Handling PTE should be a consideration within the Production Mix & Blend Operations PTE, otherwise it is being double counted.

### Response 3

For the purpose of this permit reviewing process, the calculations of PTE shall be based on the revised emission factors provided by the source. However, Red Spot Paint and Varnish Inc. is being required to conduct tests to verify the VOC emission factors. Tested emission factors shall be compared to the ones provided by the source to determine the accuracy. A testing requirement condition is added to the D section of the proposed Title V permit, and the test results shall be used for the determination of PTE.

The VOC emissions from the Production Mix & Blend operations were re-calculated based on the revised emission factors and production capacity submitted and the revised calculation sheet (Page 2 of 5 of TSD Addendum App A) is attached.

The HAP emissions from the surface coating operation were re-calculated based revised emission factors and production capacity submitted and the revised calculation sheet (Page 3 of 5 of TSD Addendum App A) is attached.

A revised summary of calculations sheet (Page 1 of 5 of TSD Addendum App A) is attached.

The following revisions have been made to the Technical Support Document under the Potential to Emit section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

This information may need to be reconsidered during the course of future new source review decisions.

## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Tank Farms (# 1, # 2, # 3 and # 4)	0.00	0.00	0.00	3.21	0.00	0.00	3.21
Production Mix & Blend Operations (building # 1, # 2 and # 3)	0.00	0.00	0.00	<del>2166.00</del> <b>143.72</b>	0.00	0.00	<del>584.93</del> <b>39.52</b>
Waste Mix & Blend Operation (building # 8)	0.00	0.00	0.00	13.97	0.00	0.00	6.99
<del>General Handling Emissions</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>	<del>77.73</del>	<del>0.00</del>	<del>0.00</del>	<del>24.94</del>
Solvent Cleaning Emissions	0.00	0.00	0.00	3.03	0.00	0.00	3.03
Inline Emissions	0.00	0.00	0.00	28.49	0.00	0.00	7.69
Insignificant Activities	2.21	3.17	0.10	0.94	14.19	16.84	0.32
Total Emissions	2.21	3.17	0.10	<del>2293.37</del> <b>193.36</b>	14.19	16.84	<del>631.11</del> <b>60.76</b>

Note:

Calculations of PTE were based on the maximum production rates (with maximum operating hours of 8760 hours per year), provided by the source.

A new testing requirements condition D.1.3 was added to the proposed Title V permit, as follows:

## Compliance Determination Requirements

### D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform VOC emission testing at the facility utilizing methods as approved by the Commissioner to verify the emission factors submitted by the source. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance. Testing shall be conducted in accordance with Section C- Performance Testing.

On January 16, 2000, a local agency inspector at Evansville Environmental Protection agency, submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

#### Comment 4

Local permits indicate that there are total of 12 tanks in tank farm #1

#### Response 4

The source has confirmed that there are 12 tanks in tank farm # 1. The following changes have been made to Section A.2 and Section D.1-Facility Description.

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons ~~for storing butyl acetate, methyl ethyl ketone, washup # 1 and washup # 2, respectively;~~
  - (2) ~~one two~~ (4 **2**) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of ~~15,000~~ **4,000** gallons ~~for storing di-isobutyl ketone;~~
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons ~~for storing isopropanol, butanol, 587 naptha and methyl amyl ketone, respectively;~~
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons ~~for storing mineral spirits and aromatic 150, respectively;~~

#### SECTION D.1

#### FACILITY OPERATION CONDITIONS

##### Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) solvent tank farm, identified as tank farm # 1, installed in 1930, exhausting to the atmosphere, and consisting of:
  - (1) four (4) fixed roof dome tanks, identified as TF1-1, TF1-2, TF1-3 and TF1-4, each with a maximum capacity of 11,500 gallons ~~for storing butyl acetate, methyl ethyl ketone, washup # 1 and washup # 2, respectively;~~
  - (2) ~~one two~~ (4 **2**) fixed roof dome tanks, identified as TF1-5A and TF1-5B, each with a maximum capacity of ~~15,000~~ **4,000** gallons ~~for storing di-isobutyl ketone;~~
  - (3) four (4) fixed roof dome tanks, identified as TF1-6A, TF1-6B, TF1-7A and TF1-7B, each with a maximum capacity of 5,470 gallons ~~for storing isopropanol, butanol, 587 naptha and methyl amyl ketone, respectively;~~
  - (4) two (2) fixed roof dome tanks, identified as TF1-8 and TF1-9, each with a maximum capacity of 10,950 gallons ~~for storing mineral spirits and aromatic 150, respectively;~~

## Comment 5

Local permits list a Spray paint booth in Bldg 14, along with lab hoods and general exhaust. There is no mention of any Spray paint booths in equipment summary. There are no lab ovens, fire pump house or emergency generators listed in the Title V.

## Response 5

The source confirmed that the spray paint booth located in building 14 is used for laboratory activities only and is considered insignificant, so does all the other spray paint booths at the source. Insignificant activities listed in Section A.3 of the permit are only those that are specifically regulated by state or federal rules. TSD has a complete list of insignificant activities at the source. Those that were listed in the TSD and not in the permit, do not have specific rules that apply to them.

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAQ ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAQ. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Nonetheless, the OAQ has added these activities to this permit in response to the source's request. The following changes have been made to Section A.3 of the Title V Permit

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) two (2) Cleaver Brooks natural gas fired boilers located in building # 3, identified as boiler # 1 rated at 8.369 mmBtu per hour, installed in 1978, and boiler # 2 rated at 4.185 mmBtu per hour, installed in 1968;
  - (2) two (2) Cleaver Brooks natural gas fired boilers located in building # 6, identified as western primary boiler, installed in 1965, and western standby boiler, installed in 1998, each rated at 4.0 mmBtu per hour;
  - (3) two (2) Cleaver Brooks natural gas fired boilers located in building # 7, identified as R & D boiler # 1, and R & D boiler # 2, both installed in 1994, and each rated at 5.5 mmBtu per hour;
  - (4) one (1) Cleaver Brooks natural gas fired boiler located in building # 7, identified as R & D boiler # 3, installed in 1994 and rated at 5.0 mmBtu per hour;
  - (5) one (1) natural gas fired boiler located in building # 14, identified as Bryan Steam Corp. boiler, installed in 1982, and rated at 0.25 mmBtu per hour;
  - (6) one (1) natural gas fired boiler located in building # 16, identified as Weil Mclain Co. boiler, installed in 1964, and rated at 1.65 mmBtu per hour;
- (b) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
  - (1) Dry material handling with PM emissions less than 5 tons/year;
- (c) **Paved and unpaved roads and parking lots with public access;**

- (d) **Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.**

  - (1) one (1) natural gas fired emergency generator, identified as Onan-Cummins-Genset at 134 horsepower;
- (e) **Stationary fire pumps,**

  - (1) one (1) emergency diesel powered fire pump, identified as Cummins Engine co., model # 6 BTA 5.9 F1;
- (f) **five (5) laboratory operations as defined in 326 IAC 2-7-1 (20)(C),**

  - (1) one (1) laboratory, identified as QAQC lab building # 3, and consisting of:
    - (a) two (2) Devilbiss wash water spray booths, identified as # 1 and 2;
    - (b) four (4) binks dry filter back spray booths, identified as # 3 and 6;
    - (c) three (3) milling units, identified as # 34 and 36;
    - (d) one (1) lab hood;
    - (e) six (6) lab ovens;
    - (f) eight (8) general exhaust ducts;
  - (2) one (1) laboratory, identified as building # 3 south, and consisting of:
    - (a) one (1) devilbiss wash water spray booth, identified as # 7;
    - (b) four (4) lab hoods;
    - (c) two (2) lab ovens;
    - (d) twenty eight (28) general exhaust ducts;
  - (3) one (1) laboratory, identified as UV/VM research, building # 5, and consisting of:
    - (a) one (1) devilbiss wash water spray booth, identified as # 74;
    - (b) two (2) dry filter back spray booths, identified as # 76 and 88;
    - (c) one (1) flow coater unit, identified as # 75;
    - (d) four (4) lab ovens;
    - (e) fifteen (15) test equipment drops;
    - (f) three (3) general exhaust ducts;
  - (4) one (1) laboratory, identified as R & D facility, building # 7, and consisting of:
    - (a) two (2) devilbiss wash water spray booths, identified as # 14 and 17;
    - (b) eight (8) binks dry filter back spray booths, identified as # 8 and 16;
    - (c) four (4) pilot scale milling units;
    - (d) one (1) tint dispenser, identified as # 101;
    - (e) seventeen (17) lab hoods;
    - (f) twenty seven (27) lab ovens;
    - (g) ten (10) test equipment drops;
    - (h) thirteen (13) general exhaust ducts;
  - (5) one (1) laboratory, identified as nextel manufacturing building # 14, and consisting of:
    - (a) one (1) dry filter back spray booth, identified as # 71;
    - (b) one (1) nextel dryer unit;
    - (c) one (1) filter belt;
    - (d) one (1) centrifuge;
    - (e) one (1) hot room;
    - (f) three (3) lab hoods;
    - (g) three (3) general exhaust ducts.



### Comment 6

On page 12 of the permit the phone numbers for Evansville EPA are incorrect, correct phone #'s are:  
812-435-6145, fax # 812-435-6155

### Response 6

The following changes have been made to Section B.12(b)(4).

#### B.12 Emergency Provisions [326 IAC 2-7-16]

---

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and the Evansville Environmental Protection Agency within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Evansville EPA Telephone Number: ~~812-426-5597~~ **812-435-6145**

Evansville EPA Facsimile Number: ~~812-426-5651~~ **812-435-6155**

### Comment 7

Page 18: Can it be incorporated into the Title V that this office must be contacted even for insignificant changes.

### Response 7

Condition - Operational Flexibility B.20(a) on page 18 of Title V permit states that the source must notify the office of IDEM, OAQ and the Evansville Environmental Protection Agency to make any change or changes at the source. There have been no changes resulting from this comment.

IDEM also decided to make the following change to the proposed Title V Permit.

All Part 70 permit documents have been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

## Appendix A: Emission Calculations

Page 1 of 5 TSD App A

**Company Name:** Red Spot Paint & Varnish Co, Inc  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**Title V:** T163-7524-00018  
**Reviewer:** Adeel Yousuf/EVP  
**Date:** February 11, 2000

Uncontrolled Potential Emissions (tons/year)								
Pollutant	Natural Gas Combustion	Tank Farm Emissions	Emissions Generating Activity		Inline Emissions	Solvent Cleaning Emissions	Dry Material Handling	TOTAL
			Production Mix & Blend Operation	Waste Mix & Blend Operation				
PM	0.32	0.00	0.00	0.00	0.00	0.00	1.89	2.21
PM10	1.28	0.00	0.00	0.00	0.00	0.00	1.89	3.17
SO2	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10
NOx	16.84	0.00	0.00	0.00	0.00	0.00	0.00	16.84
VOC	0.94	3.21	143.72	13.97	28.49	3.03	0.00	193.36
CO	14.19	0.00	0.00	0.00	0.00	0.00	0.00	14.19
total HAPs	0.32	3.21	39.52	6.99	7.69	3.03	0.00	60.76
worst case single HAP	0.303 (hexane)	3.14 (MEK)	8.18 (MEK)	4.72 (MEK)	0.00	0.00	0.00	8.18 (MEK)

Total emissions based on rated capacity at 8,760 hours/year.

Actual Potential Emissions (tons/year)								
Pollutant	Natural Gas Combustion	Tank Farm Emissions	Emissions Generating Activity		Inline Emissions	Solvent Cleaning Emissions	Dry Material Handling	TOTAL
			Production Mix & Blend Operation (1)	Waste Mix & Blend Operation (1)				
PM	0.32	0.00	0.00	0.00	0.00	0.00	1.89	2.21
PM10	1.28	0.00	0.00	0.00	0.00	0.00	1.89	3.17
SO2	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.10
NOx	16.84	0.00	0.00	0.00	0.00	0.00	0.00	16.84
VOC	0.94	3.21	27.87	10.85	28.49	3.03	0.00	74.39
CO	14.19	0.00	0.00	0.00	0.00	0.00	0.00	14.19
total HAPs	0.32	3.21	7.66	5.42	7.69	3.03	0.00	27.33
worst case single HAP	0.303 (hexane)	3.14 (MEK)	4.89 (MEK)	3.67 (MEK)	0.00	0.00	0.00	4.89 (MEK)

Total emissions based on rated capacity at 8,670 hours/year.

1) Total emissions for Production and Waste Mix & Blend Operations based on 4,800 hours of operation per year and actual production rate

## Appendix A: Emission Calculations VOC Emissions

Page 2 of 5 ADD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**Title V:** 163-7524-00018  
**Reviewer:** Adeel Yousuf/EVP  
**Date:** February 11, 2000

### Production Mix and Blend and General Handling Emissions

Emission Point	Emission Factor for Open Tote(VOC/lb paint)	Emission Factor for Close Tote (VOC/lb paint)	Maximum Production (lb paint)	PTE (TPY)	Actual Production (lb paint)	Actual Emissions (TPY)
Building # 1	1.25E-02	2.90E-03	21,885,000.00	30.84	Refer to Total	
Building # 2	1.25E-02	2.90E-03	57,120,000.00	80.48	Refer to Total	
Building # 3	1.25E-02	2.90E-03	22,995,000.00	32.40	Refer to Total	
Total from all buildings			102,000,000.00		19,778,574.00	
			<b>Subtotal</b>	<b>143.72</b>	<b>Subtotal</b>	<b>27.87</b>

### Waste Mix and Blend

Emission Point	Emission Factor (VOC/lb paint)	Maximum Production (lb paint)	PTE (TPY)	Actual Production (lb paint)	Actual Emissions (TPY)
Waste Mix and Blend	2.00E-02	2,149,719.00	13.97	1,668,732.00	10.85
		<b>Subtotal</b>	<b>13.97</b>	<b>Subtotal</b>	<b>10.85</b>

### Emissions - Solvent Cleaning

Emission Point	Emission Factor (VOC/lb paint)	Wash Solvent Used (lb)	Emissions (TPY)	Emissions (TPY)
Washup	2.00E-02	302,755.00	3.03	3.03
		<b>Subtotal</b>	<b>3.03</b>	<b>3.03</b>

Grand Total 157.69      Grand Total 41.74

#### Methodology:

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (Open tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Open tote (28.5%) + Production rate (lb/yr) \* Emission Factor (Close tote)

\* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Close tote (71.5%)

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (%) \* VOC Content (%) \* (1 ton/ 2000 lbs)

Maximum Production rate based on 8760 hours per year; Actual Production rate based on 4800 hours per year.

Average Paint VOC Content equals 50 %

Waste Solvent VOC Content equals 65 %

Production rates and emission factors are provided by the source

VOC emission factor from Building # 1, 2 and 3 = 1.25% for open tote and 0.29% for close tote

VOC emission factor for other facilities = 2.0 %

## Appendix A: Emission Calculations HAPs Emissions

Page 3 of 5 ADD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**Title V:** 163-7524-00018  
**Reviewer:** Adeel Yousuf/EVP  
**Date:** February 11, 2000

### Production Mix and Blend and General Handling Emissions

Emission Point	Emission Factor for Open Tote(VOC/lb paint)	Emission Factor for Close Tote (VOC/lb paint)	Maximum Production (lb paint)	PTE (TPY)	Actual Production (lb paint)	Actual Emissions (TPY)
Building # 1	1.25E-02	2.90E-03	21,885,000.00	8.48	Refer to Total	
Building # 2	1.25E-02	2.90E-03	57,120,000.00	22.13	Refer to Total	
Building # 3	1.25E-02	2.90E-03	22,995,000.00	8.91	Refer to Total	
Total from all buildings			102,000,000.00		19,778,574.00	
			<b>Subtotal</b>	<b>39.52</b>	<b>Subtotal</b>	<b>7.66</b>

### Waste Mix and Blend

Emission Point	Emission Factor (VOC/lb paint)	Maximum Production (lb paint)	PTE (TPY)	Actual Production (lb paint)	Actual Emissions (TPY)
Waste Mix and Blend	2.00E-02	1,074,859.50	6.99	834,366.00	5.42
		<b>Subtotal</b>	<b>6.99</b>	<b>Subtotal</b>	<b>5.42</b>

### Emissions - Solvent Cleaning

Emission Point	Emission Factor (VOC/lb paint)	Wash Solvent Used (lb)	Emissions (TPY)	Emissions (TPY)
Washup	2.00E-02	302,755.00	3.03	3.03
		<b>Subtotal</b>	<b>3.03</b>	<b>3.03</b>

Grand Total **46.51**

Grand Total **16.11**

#### Methodology:

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (Open tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Open tote (28.5%) + Production rate (lb/yr) \* Emission Factor (Close tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Close tote (71.5%)

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (%) \* HAP Content (%) \* (1 ton/ 2000 lbs)

Maximum Production rate based on 8760 hours per year; Actual Production rate based on 4800 hours per year.

HAPs equals to 27.5% of the total VOC usage

HAPs content in Waste Mix & Blend equals to 50 %

Production rates and emission factors are provided by the source

The ratio of the capacities of closed to open mixing vessels is 71.5% to 28.5%, respectively.

## Appendix A: Emission Calculations: Top 5 HAPs Emissions at Actual Pro

**Company Name:** Red Spot Paint & Varnish Co., Inc  
**Address, City** 1016 E. Columbia st. , Evansville, IN 47711  
**Title V:** 163-7524-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** February 11, 2000

Page 4 of 5 ADD App A

HAP	Emission Factor for open tote	Emission Factor for close tote	Tank Farm Emissions lb/yr (1)	Production Mix & Blend Throughput (lb/yr) (2)	Production Mix & Blend Emissions lb/yr	Waste Mix & Blend Throughput (lb/yr) (3)	Waste Mix & Blend Emissions (lb/yr)	Total HAP Emissions (lb/yr)	Total HAP Emissions (tons/yr)
Toluene	1.25E-02	2.9E-03	57.33	435128.628	2,452	166873.20	940.50	3,450	1.73
Xylene	1.25E-02	2.9E-03	17.20	343751.62	1,937	133498.56	752.40	2,707	1.35
Methy Ethyl Ketone	1.25E-02	2.9E-03	6,282	255094.16	1,438	367121.04	2069.09	9,789	4.89
Ethyl Benzene	1.25E-02	2.9E-03	17.20	183297.93	1,033	66749.28	376.20	1,426	0.71
Methyl isobutyl ketone	1.25E-02	2.9E-03	0	94096.57	530	0.00	0	530	0.27
							<b>Total</b>	<b>17,903</b>	<b>8.95</b>

Methodology:

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (Open tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Open tote (28.5%) +

Production rate (lb/yr) \* Emission Factor (Close tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Close tote (71.5%)

Note: HAPs throughput = 27.5% of VOC Throughput

- 1) See Tank Farm calculation spreadsheet
- 2) Production Mix & Blend Throughput for each HAP was provided by the source as follows:
  - a. Toluene content equals 8% of total HAPs throughput
  - b. Xylene content equals 6.3% of total HAPs throughput
  - c. MEK content equals 4.7% of total HAPs throughput
  - d. Ethyl Benzene content equals 3.3% of total HAPs throughput
  - e. MIK content equals 1.7% of total HAPs throughput
- 3) Waste Mix & Blend Throughput for each HAP was provided by the source as follows:
  - a. Toluene content equals 10% of total HAPs throughput
  - b. Xylene content equals 8.0% of total HAPs throughput
  - c. MEK content equals 22% of total HAPs throughput
  - d. Ethyl Benzene content equals 4.0% of total HAPs throughput
- 4) Total emissions based on rated capacity at 8,760 hours/year.

## Appendix A: Emission Calculations: Top 5 HAPs Emissions at Maximum Production

**Company Name:** Red Spot Paint & Varnish Co., Inc

Page 5 of 5 ADD App A

**Address, City IN:** 1016 E. Columbia st. , Evansville, IN 47711

**Title V:** 163-7524-00018

**Reviewer:** Adeel Yousuf / EVP

**Date:** February 11, 2000

HAP	Emission Factor for open tote	Emission Factor for close tote	Tank Farm Emissions lb/yr (1)	Production Mix & Blend Throughput (lb/yr) (2)	Production Mix & Blend Emissions lb/yr	Waste Mix & Blend Throughput (lb/yr) (3)	Waste Mix & Blend Emissions (lb/yr)	Total HAP Emissions (lb/yr)	Total HAP Emissions (tons/yr)
Toluene	1.25E-02	2.9E-03	57.33	2244000	12,647	214971.90	1211.58	13,916	6.96
Xylene	1.25E-02	2.9E-03	17.20	1772760.00	9,991	171977.52	969.27	10,978	5.49
Methy Ethyl Ketone	1.25E-02	2.9E-03	6,282	1315545.00	7,414	472938.18	2665.48	16,362	8.18
Ethyl Benzene	1.25E-02	2.9E-03	17.20	945285.00	5,328	85988.76	484.63	5,829	2.91
Methyl isobutyl ketone	1.25E-02	2.9E-03	0	485265.00	2,735	0.00	0.00	2,735	1.37
							<b>Total</b>	<b>49,820</b>	<b>24.91</b>

**Methodology:**

Emission (tons/yr) = Production rate (lb/yr) \* Emission Factor (Open tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Open tote (28.5%) +  
Production rate (lb/yr) \* Emission Factor (Close tote) \* VOC Content (%) \* (1 ton/ 2000 lbs) \* Percent Close tote (71.5%)

Note: HAPs throughput = 27.5% of VOC Throughput

- 1) See Tank Farm calculation spreadsheet
- 2) Production Mix & Blend Throughput for each HAP was provided by the source as follows:
  - a. Toluene content equals 8% of total HAPs throughput
  - b. Xylene content equals 6.3% of total HAPs throughput
  - c. MEK content equals 4.7% of total HAPs throughput
  - d. Ethyl Benzene content equals 3.3% of total HAPs throughput
  - e. MIK content equals 1.7% of total HAPs throughput
- 3) Waste Mix & Blend Throughput for each HAP was provided by the source as follows:
  - a. Toluene content equals 10% of total HAPs throughput
  - b. Xylene content equals 8.0% of total HAPs throughput
  - c. MEK content equals 22% of total HAPs throughput
  - d. Ethyl Benzene content equals 4.0% of total HAPs throughput
- 4) Total emissions for Production and Waste Mix & Blend Operations based on rated capacity at 4,800 hours/year and actual production rate

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Red Spot Paint & Varnish Co., Inc.  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**CP:** 163-7524  
**Plt ID:** 163-00018  
**Reviewer:** Adeel Yousuf / EVP

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

38.45
-------

336.9

**Facilities**

**MMBtu/hr**

Cleaver Brooks Boiler # 1	8.369
Cleaver Brooks Boiler # 2	4.185
Western Primary boiler	4
Western Standby boiler	4
R & D Boiler # 1	5.5
R & D Boiler # 2	5.5
R & D Boiler # 3	5
Bryan Steam Corp Boiler	0.25
Weil Mclain Co., Boiler	1.65
<b>Total</b>	<b>38.454</b>

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.32	1.28	0.10	16.84	0.93	14.15

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emission Calculations****Natural Gas Combustion Only****MMBTU/HR <100****Utility Boiler****HAPs Emissions**

**Company Name:** Red Spot Paint & Varnish Co, Inc.  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**CP:** 163-7524  
**Pit ID:** 163-00018  
**Reviewer:** Adeel Yousuf / EVP

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

38.45

336.9

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.000	0.000	0.013	0.303	0.001

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.000	0.000	0.000	0.000	0.000

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.



**Appendix A: Emission Calculations**  
**Natural Gas Combustion**  
**MM Btu/hr 0.3 - < 100**

Page 4 of 17 TSD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc.  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**CP:** T163-7524-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** Sep 07, 2000

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.34

0.2

Heat Input Capacity includes:

one (1) emergency generator, identified Onan-Cummins-Genset, with a rated heat input of 0.34 mmBtu per hour

	Pollutant					
Emission Factor in lb/MMCF	PM 10.00	PM10 10.00	SO2 0.60	NOx 3400.00	VOC 82.90	CO 430.00
Potential Emission in tons/yr	0.001	0.001	0.000	0.290	0.007	0.037

Methodology:

Emission Factors for emergency generator from SCC #2-02-001-02

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 500 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 er

## Appendix A: Emission Calculations: Dry material handling

Page 5 of 17 TSD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc

**Address, City** 1016 E. Columbia st., Evansville, IN 47711

**Title V:** 163-7524-18

**Reviewer:** Adeel Yousuf /EVP

**Date:** September 10, 2000

Amount of dry materials handled per year =	1375991	lbs	
Emissions Factor =	5.5	lbs PM/ton dry material	
Emission (lb/hr)	0.432	lb/ hr	
Emission (lb/yr) =	3783.975	lbs PM / yr	
<b>Emission (tons/yr) =</b>	<b>1.892</b>	<b>tons/yr</b>	

Emission factor based on 8% of total process weight rate based on AP-42, Volume.

**Appendix A: Emissions Calculations  
Inline VOC Emissions**

Page 6 of 17 TSD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc.  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**CP:** 163-7524  
**Plt ID:** 163-00018  
**Reviewer:** Adeel Yousuf / EVP

**IN LINE EMISSIONS FROM SOCCMI FACTORS**

	NUMBER	EMISSION FACTOR (lb VOC/hr)	HOURS/YR	TPY EMISSIONS
PUMPS	51	0.047	8760	10.5
VALVES	289	0.00051	8760	0.65
FLANGES	126	0.0018	8760	0.99
SAMPLE PORTS	109	0.033	8760	15.75
OPEN END	37	0.0037	8760	0.6

<b>VOC</b>	<b>Total</b>	<b>28.49 tons/yr</b>
<b>HAPs</b>	<b>Total</b>	<b>7.69 tons/yr</b>

Methodology:

Emissions (ton/yr): # of Valves \* Emission Factor (lb VOC/hr) \* 8760 (hours/yr) \* (1 ton/2000 lbs)

HAPs Emissions (ton/yr): VOC Emissions (ton/yr) \* HAPs Contnet (27 %)

**Appendix A: Emissions Calculations**  
**Fugitive Emissions Calculations**

Page 7 of 17 TSD App A

**Company Name:** Red Spot Paint & Varnish Co., Inc.  
**Address City IN Zip:** 1016 E. Columbia st., Evansville, IN 47711  
**CP:** 163-7524  
**Plt ID:** 163-00018  
**Reviewer:** Adeel Yousuf / EVP

Tank Farm # 4 Potentials

	Toluene TF4-T1 Breathing	TF4-T1 Working	Toluene TF4-T2 Breathing	TF4-T2 Working	Toluene TF4-T3 Breathing	TF4-T3 Working
Diameter (ft)	6.20	6.20	5.60	5.60	5.60	5.60
Height (ft)	16.00	16.00	13.70	13.70	13.70	13.70
Mw	92.14	92.14	92.14	92.14	92.14	92.14
Pa (psia)	0.71	0.71	0.11	0.11	0.16	0.16
Tank Capacity	3500.00	3500.00	2500.00	2500.00	2500.00	2500.00
C	0.31	N/A	0.29	N/A	0.29	N/A
Fp	1.58	N/A	1.58	N/A	1.58	N/A
Kc	1.00	1.00	1.00	1.00	1.00	1.00
Turnovers (N)	N/A	1.71	N/A	1.71	N/A	1.71
Delta T (F)	20.10	N/A	20.10	N/A	20.10	N/A
turnover factor	1.00	1.00	1.00	1.00	1.00	1.00
Temp. (F)	66.10	66.10	66.10	66.10	66.10	66.10
VP (psia)	0.01	0.01	0.01	0.01	0.01	0.01
Temp in Rankine	526.10	526.10	526.10	526.10	526.10	526.10
Saturation Factor	1.45	1.45	1.45	1.45	1.45	1.45
POTENTIALS	TOLUENE		TOLUENE		TOLUENE	
Working		0.00006		0.00004		0.00004
Breathing	0.008		0.021		0.016	
Loading Losses		0.00001		0.00001		0.00001

	Working	Breathing	Loading	
Potential Toluene	0.0001	0.045	0.00003	<b>0.00451</b> tons/yr

	Xylene/Ethyl Benzene		Naptha		Toluene		Toluene		Toluene		Toluene		Toluene	
	T1 Breathing	T1 Working	T2 Breathing	T2 Working	T3 Breathing	T3 Working	T4 Breathing	T4 Working	T5 Breathing	T5 Working	T6A Breathing	T6A Working	T6B Breathing	T6B Working
Diameter (ft)	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90	5.90
Height (ft)	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00	14.00
Mw	106.17	106.17	115.00	115.00	92.14	92.14	92.14	92.14	92.14	92.14	92.14	92.14	92.14	92.14
Pa (psia)	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70
Tank Capacity (gal)	2100.00	2100.00	2100.00	2100.00	2100.00	2100.00	2300	2300	2300	2300	2300	2300	2300	2300
C	0.30	N/A	0.30	N/A	0.30	N/A	0.30	N/A	0.30	N/A	0.30	N/A	0.30	N/A
Fp	1.58	N/A	1.58	N/A	1.58	N/A	1.58	N/A	1.58	N/A	1.58	N/A	1.58	N/A
Kc	1.00	1.00	1.00	1.00	1.00	1.00	1	1	1	1	1	1	1	1
Turnovers (N)	N/A	0.56	N/A	0.84	N/A	1.71	N/A	1.71	N/A	1.71	N/A	1.71	N/A	1.71
Delta T (F)	20.10	N/A	20.10	N/A	20.10	N/A	20.10	N/A	20.10	N/A	20.10	N/A	20.10	N/A
Turnover factor (Kn)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Temp. (F)	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10
VP (psia)	0.18	0.18	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Temp in Rankin	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10
Saturation Factor	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45
POTENTIALS	Xylene/ Ethyl Benzen		Naptha		Toluene		Toluene		Toluene		Toluene		Toluene	
Working		0.0003		0.00001		0.00003		0.00004		0.00004		0.00004		0.00004
Breathing	0.008		0.001		0.001		0.001		0.001		0.001		0.001	
Loading Losses		0.0003		0.00001		0.00001		0.00001		0.00001		0.00001		0.00001

	Working	Breathing	Loading	
Xylene/Ethyl Benzene	0.008	0.0003	0.0003	<b>0.0086</b>
Naptha	0.001	0.00001	0.00001	<b>0.00102</b>
Toluene	0.00411	0.00019	0.00004	<b>0.00434</b>

**0.01396** tons/yr

[illegible]

Tank Farm # 1 cont.

Page 10 of 17 TSD App A

	MEK T1 Breathing	T1 Working	MEK T2 Breathing	T2 Working	MEK T3 Breathing	T3 Working	MEK T4 Breathing	T4 Working
Diameter (ft)	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00
Height (ft)	11.50	11.50	11.50	11.50	23.00	23.00	23.00	23.00
Mw	72.10	72.10	72.10	72.10	72.10	72.10	72.10	72.10
Pa (psia)	14.70	14.70	14.70	14.70	14.70	14.70	14.70	14.70
Tank Capacity (gal)	5470.00	5470.00	5470.00	5470.00	10950.00	10950.00	10950.00	10950.00
C	0.48	N/A	0.48	N/A	0.48	N/A	0.48	N/A
Fp	1.58	N/A	1.58	N/A	1.58	N/A	1.58	N/A
Kc	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Turnovers (N)	N/A	5.58	N/A	3.07	N/A	1.77	N/A	2.44
Delta T (F)	20.10	N/A	20.10	N/A	20.10	N/A	20.10	N/A
Turnover factor (Kn)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Temp. (F)	66.10	66.10	66.10	66.10	66.10	66.10	66.10	66.10
VP (psia)	1.50	1.50	1.50	1.50	1.50	1.50	1.50	1.50
Temp in Rankin	526.10	526.10	526.10	526.10	526.10	526.10	526.10	526.10
Saturation Factor	1.45	1.45	1.45	1.45	1.45	1.45	1.45	1.45
POTENTIALS	MEK		MEK		MEK		MEK	
Working		0.04		0.022		0.025		0.035
Breathing	0.069		0.069		0.098		0.098	
Loading Losses		0.001857		0.001857		0.001857		0.001857

	Working	Breathing	Loading	
MEK	1.962	1.159	0.02	<b>3.141</b> tons/yr

[illegible]



[illegible]

Tank Farm # 2 Cont.

Page 13 of 17 TSD App A

	Toluene T10 Breathing	T10 Working	Toluene T1C Breathing	T1C Working
Diameter (ft)	5.70	5.70	8.00	8.00
Height (ft)	8.00	8.00	7.00	7.00
Mw	92.14	92.14	92.14	92.14
Pa (psia)	14.70	14.70	14.70	14.70
Tank Capacity (gal)	1500.00	1500.00	2610.00	2610.00
C	0.30	N/A	0.43	N/A
Fp	1.58	N/A	1.58	N/A
Kc	1.00	1.00	1.00	1.00
Turnovers (N)	N/A	1.63	N/A	1.63
Delta T (F)	20.10	N/A	20.10	N/A
Turnover factor (Kn)	1.00	1.00	1.00	1.00
Temp. (F)	66.10	66.10	66.10	66.10
VP (psia)	0.01	0.01	0.01	0.01
Temp in Rankin	526.10	526.10	526.10	526.10
Saturation Factor	1.45	1.45	1.45	1.45
POTENTIALS	Toluene		Toluene	
Working		0.00002		0.00004
Breathing	0.001		0.001	
Loading Losses		0.00001		0.00001

	Working	Breathing	Loading	
Aromatic 100	0.0003	0.01	0.00008	<b>0.01038</b>
Naphtha	0.00095	0.02300	0.00024	<b>0.02419</b>
Toluene	0.00071	0.019	0.0001	<b>0.01981</b>
				<b>0.05438</b>

tons/yr

All the Tank parameters, chemical properties and emissions are provided by the Source